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4 **UNITED STATES DISTRICT COURT**
5 **NORTHERN DISTRICT OF CALIFORNIA**
6 **OAKLAND DIVISION**

7
8 IN RE CALIFORNIA BAIL BOND
9 ANTITRUST LITIGATION

10
11 THIS DOCUMENT RELATES TO:
12 ALL ACTIONS

Master Docket No. 19-cv-00717-JST-DMR

CLASS ACTION

**STIPULATION AND [PROPOSED]
ORDER RE: EXTENSION TO FILE
THIRD CONSOLIDATED AMENDED
COMPLAINT**

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Pursuant to Civil Local Rule 6-2, all Plaintiffs and Defendants (the “Parties”) in the above-entitled action stipulate as follows:

WHEREAS, the Court ordered the Parties to proceed with discovery on December 10, 2020, with Dismissed Defendants¹ to submit pre-amendment discovery focused on deficiencies the Court identified in Plaintiffs’ Second Amended Complaint (ECF No. 151);

WHEREAS, the Court referred the management of discovery in this case, “including the issues set forth in the [P]arties’ joint case management statement, ECF No. 173,” to Magistrate Judge Ryu on January 25, 2021 (ECF No. 175);

WHEREAS, the deadline for Plaintiffs to file their Third Consolidated Amended Complaint (“TCAC”) is January 10, 2022 (ECF No. 237);

WHEREAS, on August 12, 2021, Plaintiffs and Dismissed Defendants submitted to Judge Ryu a dispute regarding the proper geographic scope of pre-amendment discovery based on certain search terms and custodians (ECF No. 208);

WHEREAS, on September 30, 2021, Judge Ryu set a deadline of November 29, 2021 for Dismissed Defendants to produce all responsive documents regardless of geography, except documents that pertain solely to individual bail bond transactions outside California (ECF No. 230), and related privilege logs were accordingly due by December 13, 2021 (ECF No. 183);

WHEREAS, several Dismissed Defendants were granted extensions to produce documents pursuant to Judge Ryu’s order by mid-December;

WHEREAS, Plaintiffs require time to review Dismissed Defendants’ document productions and privilege logs once produced, and may challenge entries in the latter;

¹ For the avoidance of doubt, the Dismissed Defendants are Allegheny Casualty Company, International Fidelity Insurance Company, AIA Holdings, Inc., American Contractors Indemnity Company, Bankers Insurance Company, Accredited Surety and Casualty Company, Inc., Lexington National Insurance Company, Seneca Insurance Company, Continental Heritage Insurance Company, Seaview Insurance Company, Danielson National Insurance Company, Financial Casualty & Surety, Inc., Indiana Lumbermens Mutual Insurance Company, Lexon Insurance Company, The North River Insurance Company, Philadelphia Reinsurance Corporation, Sun Surety Insurance Company, United States Fire Insurance Company, Universal Fire & Casualty Company, Williamsburg National Insurance Company, California Bail Agents Association, Golden State Bail Agents Association, American Bail Coalition, Inc., Two Jinn, Inc., All-Pro Bail Bonds Inc., and Jerry Watson.

1 **WHEREAS**, the Parties agree to extend the deadline for Plaintiffs to file their TCAC to
2 February 25, 2022;

3 **WHEREAS**, the Court has set no further deadlines in this matter, and therefore none
4 would be affected;

5 **NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED** by and
6 between the Parties that Plaintiffs shall have until February 25, 2022 to file their TCAC.

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8 Dated: December 29, 2021

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[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED that Plaintiffs shall have until February 25, 2022 to file their TCAC.

Dated: December __, 2021

THE HONORABLE JON S. TIGAR
UNITED STATES DISTRICT JUDGE

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Adam Gitlin, attest that the concurrence in the filing of this document has been obtained from the other signatories. Executed on December 29, 2021, in Richmond, California.

/s/ Adam Gitlin

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